

WWR# 040044499

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Hwan Yul Yong  
Hong Suk Yong,

Debtors

Citizens Bank, N.A

Movant

Case No. 16-16644-JKF

Chapter 13

Related to Document No. 55 & 60

**Hearing Date:** 04/25/2018

**Hearing Time:** 9:30 AM

**STIPULATION RESOLVING MOTION TO FOR RELIEF FROM AUTOMATIC STAY**

Now this \_\_\_\_\_ day of \_\_\_\_\_, 2018. Upon the Motion of Citizens Bank, N.A for Relief from Automatic Stay and the Response filed by the Debtor. Upon statements of counsel, the evidence and law:

This Court FINDS that Citizens Bank, N.A, Movant herein, is a creditor of the estate by virtue of a certain Mortgage with the Debtor, secured by the real property located at 1902 Berks Road, Norristown, PA 19403 that the Movant has not been adequately protected and that Movant is entitled to the relief prayed for in accordance with the terms set forth herein.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Citizens Bank, N.A be and is hereby granted relief from the Automatic Stay to take the necessary steps to permit foreclosure of the Mortgage and/or a Sheriffs' sale of the subject real property referenced herein.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that said relief shall be stayed so long as the Debtor makes each and every payment in a timely and complete manner beginning with the 04/29/2018 payment which must be paid in full in the amount of \$1391.59 to Citizens Bank, N.A. 443 Jefferson Blvd., mail stop: RJW 135, Warwick, RI. 02886, on or before 04/29/2018. The Debtor must also amend the plan within thirty (30) days of the entry of this Stipulation to cure Movant's arrears totaling \$17,174.06 (\$16,143.06 arrears payments plus \$1,031.00 attorney fees/cost) through the Debtor's Chapter 13 Plan and remain current. Regular payments are due to Movant on or before the 29th day of each month.

Should the Debtor default in any payment to Movant and/or to the Trustee, or should Debtor's counsel fail to amend the Chapter 13 plan within 30 days of the entry of this Stipulation, notice will be sent to Debtor's counsel advising of said default. If the default is not cured within 10 days as of the date of the notice, Movant's counsel shall file a Certificate of Default with the Court and a proposed Order requesting final relief from the automatic stay. Movant shall only be required to send one (1) notice of default to Debtor's counsel via email. Any Certificate of default filed with the Court shall indicate that Creditor's counsel has confirmed that debtor has failed to abide by the terms set forth herein confirmed that debtor and/or debtor's counsel has failed to abide by the terms set forth herein.

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Honorable Jean K. FitzSimon  
United States Bankruptcy Judge

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/s/ Nathalie Paul  
Attorney For Movant  
Nathalie Paul  
170 S. Independence Mall W., Suite 874W  
Philadelphia, PA 19106

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/s/ Joseph Quinn w/permission  
Attorney for the Debtor  
JOSEPH L QUINN  
152 E. High Street, Suite 100  
Pottstown, PA 19464

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/s/Frederick L. Reigle w/permission  
Frederick L. Reigle, Trustee

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Honorable Jean K. FitzSimon  
United States Bankruptcy Judge

/s/ Nathalie Paul

Attorney For Movant

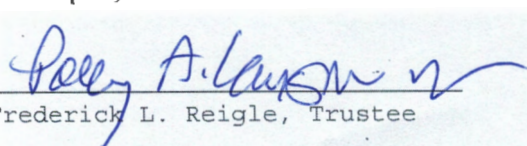
Nathalie Paul

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Attorney for the Debtor

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Frederick L. Reigle, Trustee